

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

EUNICE and ROBERT McKINNES,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP, INC.,  
et al.,

Defendants.

CIVIL ACTION NO.  
2:06-cv-00041-MHT

COUNTY OF Houston

STATE OF Alabama

AFFIDAVIT OF LISA WOOD

PERSONALLY APPEARED before the undersigned officer, duly authorized to administer oaths, Lisa Wood, who states under oath as follows:

1. My name is Lisa Wood. The statements made in this declaration are based upon my own personal knowledge as more specifically set forth below and, if sworn as a witness, I could testify competently as to them.

2. I was at one time an employee at the Dothan branch of American General Financial Services, Inc. ("AGFS"), formerly known as American General Finance, Inc. I have not, however, been employed by AGFS since 1998.

3. At no time did I ever inform customers, including Robert and Eunice McKinnes, that credit insurance was required, that credit insurance would improve the customer's chances of obtaining a loan, or that credit insurance would improve a customer's credit score.

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4. However, given the amount of time that has passed, I do not remember the details of and cannot testify with any specificity regarding Robert and Eunice McKinnies' November 23, 1994 loan with AGFS.

**FURTHER AFFIANT SAYETH NOT.**

This the 22 day of February, 2006.

  
\_\_\_\_\_  
Lisa Wood

SWORN TO AND SUBSCRIBED BEFORE ME, this the 22<sup>nd</sup> day of February, 2006.

  
\_\_\_\_\_  
NOTARY PUBLIC  
My Commission Expires: 8/9/06